

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

FILED
8/28/2024

VKM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Changhu Youthsky Import and Export Co.,Lt)
Plaintiff)
v.)
Ebay: buff8855)
Defendant)

Case Number: 1:24-cv-04766
Judge: Martha M. Pacold
Magistrate Judge: Maria Valdez

Civil Caption Form submittal:

Upon contacting the Deputy Clerk Office in the Northern District Court of Illinois I was instructed on filing these forms in response to the "Summons in a Civil Case" I received on August 22, 2024.

The Complaint is: Changshu Youthsky import and export co. ltd (Plaintiff) against Ebay: buff8855 (Defendant) for offering for sale and/or selling unauthorized and unlicensed counterfeit products, including pillowcases, coverlets, quilt covers and bedding sets, using counterfeit versions of Plaintiff's federally registered trademarks.

In answer to this allegation I am not selling counterfeit products from the Plaintiff. I purchased the product that was sold through Ebay from a retail store in Mississippi. I offered said product (Simple and Opulence 100% Linen Duvet Cover with 2 Satin Basic Grey King New Sealed) ***see Exhibit 3 via Ebay and it was purchased by: Ya Liu 1519 W. Warren Blvd Unit 501 PMB 171 Chicago, IL 90007. I do not manufacturer nor do I represent myself as being a source for Changhu Youthsky Import and Export Co. Ltd.

Monday, August 26, 2024

Paypal – Legal Team
2211 N. 1st Street
San Jose, CA 95131

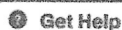
RE: Paypal #buff8855-eBay-4766

Dear Sir/Madam:

I am writing due to a Legal Hold being placed upon my Paypal account by Concord and Sage PC. This action was taken due to a product that we sold (see photos) that they deemed "Infringement Right". We purchased this product in "Good Faith" from a retail establishment and did not have any knowledge that the product was according to them "Protected". I have not received any legal document describing our "Infringement". The last email sent August 20, 2024 claims they want to settle this Legal Action for a \$3,000 remittance. Can you lend any assistance in confirming this is legitimate and/or remove this Legal Hold on my account?

Best Regards,

William & Glenna Buff
105 Robertson Dr.
Somerville, TN 38068
(901) 831 – 9841 cell

 Get Help

Your account access is temporarily limited

We've received Legal Demand/Order(s) that affect your PayPal account. The order(s) is a legal seizure of property or accounts to satisfy a debt. The order(s) requires us to freeze and/or turn over any funds in your account. If you have any questions or need more information about the order(s), please contact the relevant agency(s).

Some of your account features will be blocked until this matter is resolved.

Reference ID: PP-L-479417682048

Legal Demand/Order(s) received

[See Details](#)



Legal Demand/Order(s) received

PayPal has received one or more Legal Demand/Order(s) that affect your account. If you have any questions or need more information about the order(s), please contact the relevant agency(s).

Legal Demand / Order Type : Temporary

Restraining Order

Case Caption :

Changshu Youthsky
Import and Export
Co LTD v The
Partnerships et

Legal Demand / Order ID : 24CV04766

Agency received from :

Concord & Sage

Contact person :

Qin Li, Esq.

Contact information :

enforcement@concordssage.com

Legal Hold

Yahoo/Sent ☆



William Buff

From: w.buff@att.net

To: Enforcement@concordssage.com



Mon, Aug 12 at 5:31 AM ☆

Good morning,

I have received notice from my Paypal account that a Legal Hold has been placed upon my account. Can you please explain this action? My Paypal account is under.... glennabuff8855@gmail.com Thank You

Legal Demand/Order(s) received

PayPal has received one or more Legal Demand/Order(s) that affect your account. If you have any questions or need more information about the order(s), please contact the relevant agency(s).

Legal Demand / Order Type :

Temporary

Restraining Order

Case Caption :

Changshu Youthsky
Import and Export Co
LTD v The
Partnerships et

Legal Demand / Order ID :

24CV04766

Agency received from :

Concord & Sage

Contact person :

Qin Li, Esq.

Item



Simple & Opulence 100% Linen Duvet
Cover with 2 Shams Basic Grey King New
Sealed

Quantity

1

Price

\$94.50

Total

\$94.50

Item ID: 266063067947

Tracking 9434608205499948208598

[See more item specifics](#) ▾

What your buyer paid

Item subtotal	\$94.50
Shipping	\$0.00
Sales tax*	\$9.69

Order total **\$104.19**

What you earned ^

Order total **\$104.19**

eBay collected from buyer

Sales tax **-\$9.69**

Selling costs

Transaction fees **-\$12.62**

Order earnings **\$81.68**

[See more details](#)

----- Forwarded message -----

From: **enforcement** <enforcement@concordstage.com>

Date: Tue, Aug 13, 2024 at 1:30 AM

Subject: Re:Paypal #buff8855-eBay-4766

To: Glenna Buff <glennabuff8855@gmail.com>

Hi,

Please find attached evidence of infringement.

Best,

IP Department

1360 Valley Vista Dr, Suite 140, Diamond Bar CA 91765

----- Original -----

From: "Glenna Buff" <glennabuff8855@gmail.com>;

Date: Mon, Aug 12, 2024 07:55 AM

To: "enforcement" <enforcement@concordstage.com>;

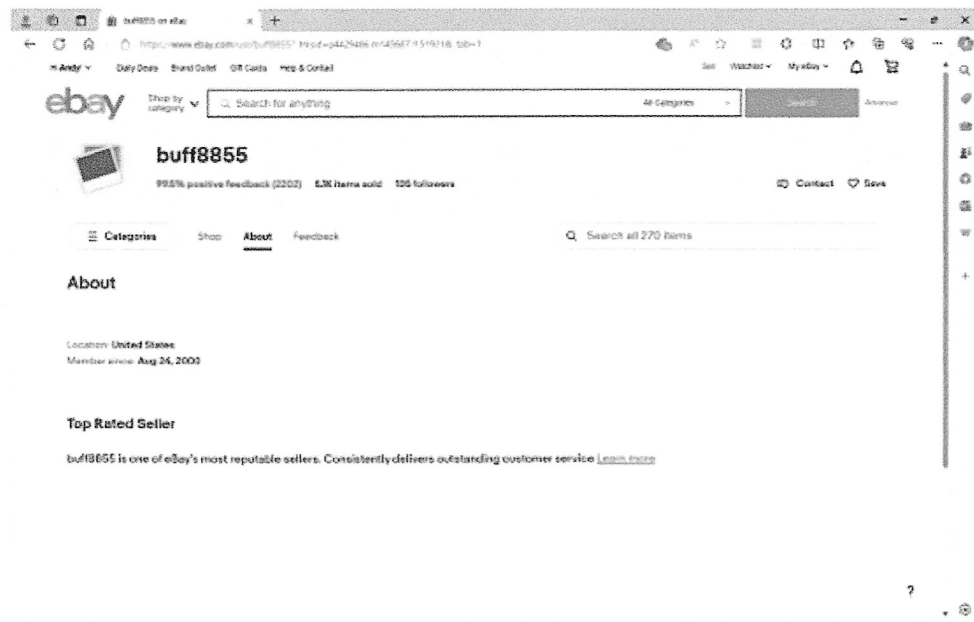
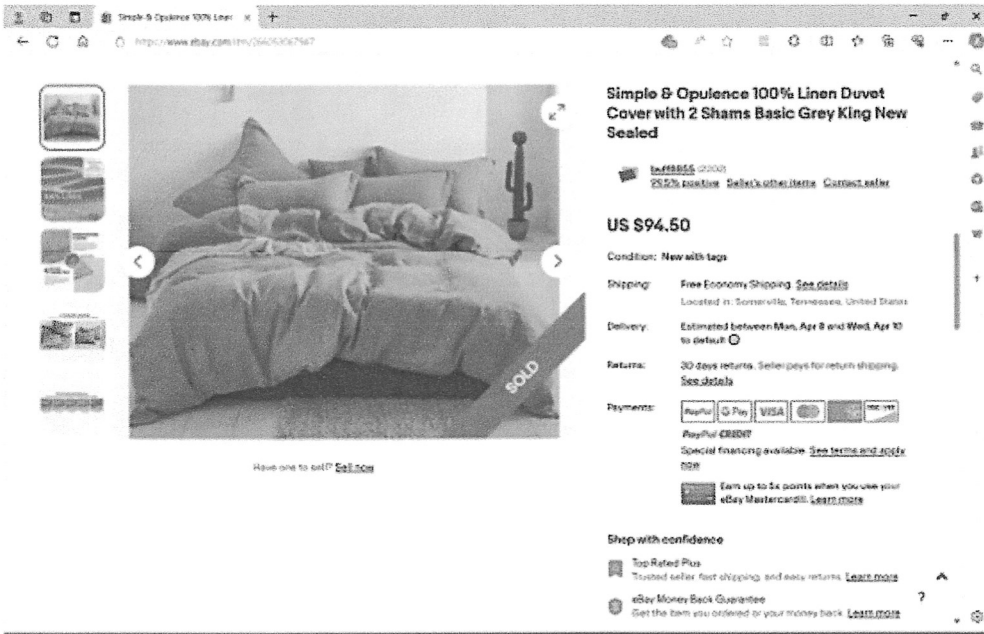
Subject: Paypal

Legal Hold on Funds due to your contact to Paypal.com Please confirm as to what has caused this Legal Hold on my Paypal account. Thank You

Defendant No.: 15

Store Name: buff8855

Platform: Ebay



Hi Yeli

Only Deals

Brand Outlet

Gift Cards

Help & Contact

Sell

Watchlist

My eBay

ebay

Show by category

Search for anything

All Categories

Search

Advanced

Order details

Printer-friendly page

Order info

Time placed
Apr 2, 2024 at 3:59 PM

Order number
17-11387-73315

Total
\$104.19 (1 item)

Sold by
buff855

Shipping address

Yeli lu
1519 W Warren Blvd Unit 503, PMS 171
Chicago, Illinois 60607-1840
United States

Delivery info

Paid

Apr 2

Shipped

Delivered

Tracking details

Shipping Service
Economy Shipping

Payment info

VISA

Ending in 7708

Yeli lu

Apr 2 at 3:11 PM

\$104.19

1 item

\$94.50

Shipping

Free

Tax

\$0.00

Order total

\$104.19

Item info

Simple & Opulence 100% Linen Duvet Cover with 2 Shams Basic Grey King New Sealed

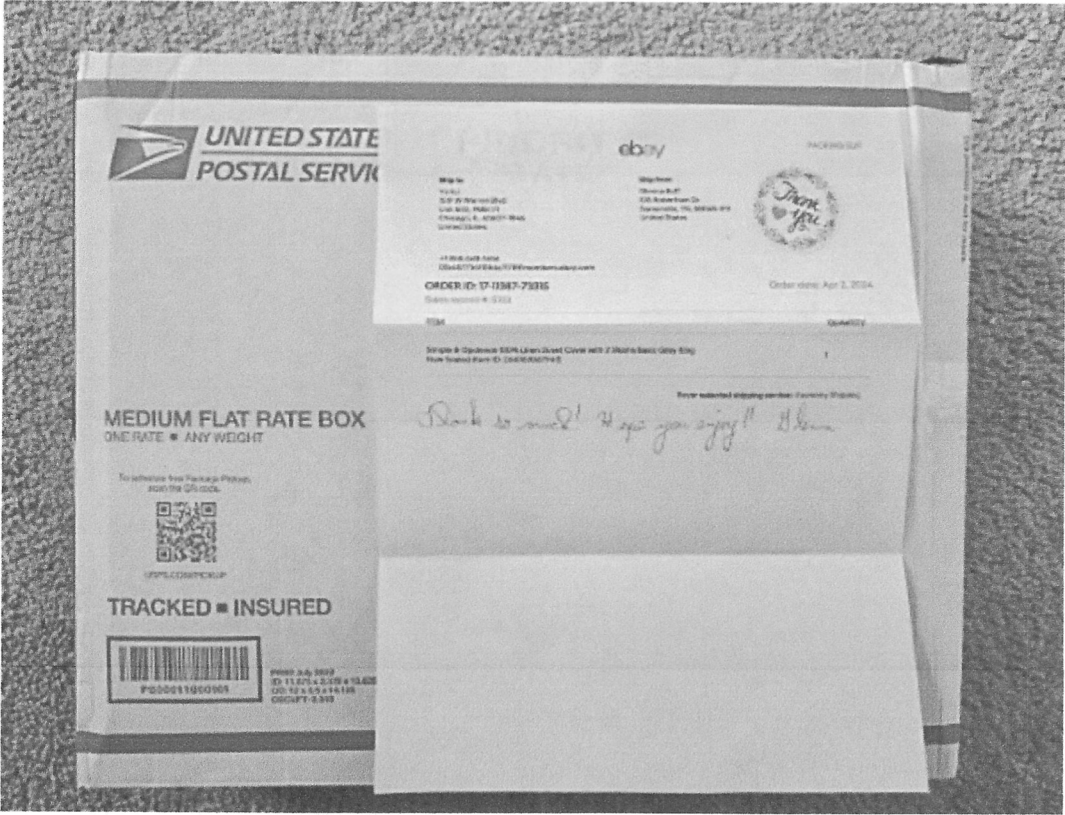
\$94.50

Item number: 269053067947

Return accepted through May 8, 2024

Contact seller

More actions







Glenna Buff

From: glennabuff8855@gmail.com

To: ICE Husband Bill Buff



Tue, Aug 20 at 11:52 AM

----- Forwarded message -----

From: **Glenna Buff** <glennabuff8855@gmail.com>

Date: Tue, Aug 20, 2024, 9:59 AM

Subject: Re: Paypal #buff8855-eBay-4766

To: enforcement <enforcement@concord sage.com>

You can't possibly be serious! We have received nothing from you informing us of what you think we did. If you want to take this any further, send all pertinent information for our attorney review and you will, then, receive your answer. This is starting to sound like a scam and I will be reporting it if you can't give us some legal documentation. Glenna

On Tue, Aug 20, 2024 at 9:40 AM enforcement <enforcement@concord sage.com> wrote:

Hi,

My client is willing to settle for \$3000, please advise.

Best,

IP Department



Concord & Sage

1360 Valley Vista Dr, Suite 140, Diamond Bar CA 91765

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SUMMONS IN A CIVIL CASE

Changshu Youthsky Import and Export Co. Ltd,

CASE NUMBER: 1:24-cv-04766

V.

ASSIGNED JUDGE: Martha M. Pacold

The Partnerships and Unincorporated
Associations Identified on Schedule "A"

DESIGNATED
MAGISTRATE JUDGE: Maria Valdez

TO: (Name and address of Defendant)

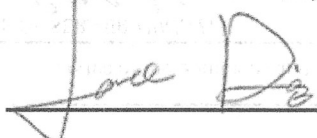
Kingdom Restore and all other Defendants identified in the Complaint

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Concord & Sage PC
ATTN: Qin Li
1360 Valley Vista Dr, Ste 140
Diamond Bar, CA, 91765

an answer to the complaint which is herewith served upon you, 21 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

THOMAS G. BRUTON, CLERK



(By) DEPUTY CLERK



August 22, 2024

DATE